

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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IN RE: AUTOMOTIVE PARTS  
ANTITRUST LITIGATION

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:  
: Master File No. 12-md-02311  
:  
: Case No. 12-cv-00202

PRODUCT(S):

INSTRUMENT PANEL CLUSTERS

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This Document Relates to:

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: Hon. Marianne O. Battani  
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ALL DEALERSHIP ACTIONS

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**DEALERSHIP PLAINTIFFS' MOTION FOR PRELIMINARY  
APPROVAL OF PROPOSED SETTLEMENT WITH DEFENDANTS  
NIPPON SEIKI CO., LTD., N.S. INTERNATIONAL, LTD., AND  
NEW SABINA INDUSTRIES, INC. AND PROVISIONAL  
CERTIFICATION OF A SETTLEMENT CLASS**

Dealership Plaintiffs hereby move the Court, pursuant to Rule 23(c) and (e) of the Federal Rules of Civil Procedure, for an Order in the form attached hereto:

(1) Preliminarily approving the proposed settlement of this litigation with Defendants Nippon Seiki Co., Ltd., N.S. International, Ltd., and New Sabina Industries, Inc., (collectively, "Nippon Seiki");

(2) Provisionally approving the proposed Settlement Class;

(3) Staying the proceedings against Nippon Seiki in accordance with the terms of the Settlement Agreement;

(4) Authorizing Dealership Plaintiffs to provide notice of the Settlement Agreement to class members at a later date, in a form and manner to be approved in advance by this Court; and

(5) Appointing Interim Co-Lead Class Counsel as Settlement Class Counsel, and Interim Liaison Counsel as Settlement Class Liaison Counsel, for purposes of this settlement.

In support of this Motion, Dealership Plaintiffs rely upon and incorporate by reference herein the facts and legal arguments set forth in the accompanying Memorandum of Law.

Nippon Seiki consents to this motion and to the entry of the proposed order.

Respectfully submitted,

Dated: December 23, 2013

/s/

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*Interim Co-Lead Class Counsel for Dealership  
Plaintiffs and Proposed Settlement Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 23, 2013, I caused the foregoing motion to be filed using the Court's CM/ECF system which will send electronic service to all counsel of record.

/s/Brendan H. Frey

Brendan H. Frey

Dated: December 23, 2013